

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LEHMAN BROTHERS HOLDINGS, INC. : Case No.: 07-CV-2990 (DAB/HBP)
DERIVATIVE LITIGATION : ECF Case
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**NOTICE OF NOMINAL DEFENDANT'S MOTION TO DISMISS THE
VERIFIED CONSOLIDATED SHAREHOLDER DERIVATIVE COMPLAINT**

PLEASE TAKE NOTICE THAT, upon the annexed Declaration of James G. Gamble, dated March 4, 2008, and the exhibits provided therewith and the accompanying Memorandum of Law, dated March 4, 2008, Nominal Defendant Lehman Brothers Holdings, Inc. hereby moves this Court to dismiss the Verified Consolidated Shareholder Derivative Complaint for failure to comply with Federal Rule of Civil Procedure 23.1.

Dated: New York, New York
March 4, 2008

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